BEFORE THE POSTAL RATE COMMISSION

MAR 23 1/ 19 AM '00

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORY FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS ROBINSON (UPS/USPS-T34-35) (March 23, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatory directed to United States Postal Service witness Raymond: UPS/USPS-T34-35.

Respectfully submitted,

John E. McKeever William J. Pinamont Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

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Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS ROBINSON

UPS/USPS-T34-35. Interrogatory UPS/USPS-T34-4 asked about a statement in an analyst's report discussing the Postal Service's contract with Emery that Emery "has recognized \$123.7 million in unbilled revenue to date" in relation to the Priority Mail contract. In an objection filed at the Commission on February 25, 1999, the Postal Service advised that Emery's "unbilled revenue" under the contract is a "matter under discussion." As of the date of your answer, has the Postal Service agreed to pay Emery any amounts over and above the amounts which the Postal Service contended were to be paid under the PMPC contract, either with respect to BY1998, FY1999, FY2000, or FY2001? If so, provide those amounts for each year.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

William J. Pinamont

Attorney for United Parcel Service

Dated: March 23, 2000

Philadelphia, Pa.

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